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11 **Pro Hac Vice Applications Forthcoming*

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 JANE DOE,

15 Plaintiffs,

16 v.

17 JOSEPH LOMBARDO, Governor of Nevada
18 in his official capacity; AARON FORD,
Attorney General of Nevada in his official
19 capacity; NYE COUNTY; ELKO COUNTY;
20 STOREY COUNTY; WESTERN BEST, INC,
D/B/A CHICKEN RANCH; WESTERN BEST,
21 LLC; DESERT ROSE CLUB, LLC;
HACIENDA ROOMING HOUSE, INC. D/B/A
22 BELLA'S HACIENDA RANCH; MUSTANG
RANCH PRODUCTIONS, LLC D/B/A
23 MUSTANG RANCH LOUNGE, LLC; AND
24 LEONARD "LANCE" GILMAN in his official
capacity,

25 Defendants.

CASE NO.: 3:24-cv-00065-MMD-CLB

**ORDER GRANTING STIPULATION
FOR EXTENSION OF TIME FOR
PLAINTIFF TO FILE AN OPPOSITION
TO STATE DEFENDANTS' MOTION TO
DISMISS [ECF NO. 24], FOR
STATE DEFENDANTS TO FILE A
REPLY TO PLAINTIFF'S OPPOSITION
TO [ECF NO. 24], FOR PLAINTIFF
TO FILE AN OPPOSITION TO STATE
DEFENDANTS' MOTION TO STAY
[ECF NO. 30], AND FOR STATE
DEFENDANTS TO FILE A REPLY TO
PLAINTIFF'S OPPOSITIONS TO [ECF
NO. 24 & 30]**

[FIRST REQUEST]

COMES NOW Plaintiff Jane Doe, by and through her counsel of record, and Defendants Joseph Lombardo and Aaron Ford (“State Defendants”) by and through their counsel of record, and hereby stipulate and agree to the following regarding State Defendants’ Motion to Dismiss [ECF No. 24] filed on April 1, 2024, and State Defendants’ Motion to Stay Case or Discovery [ECF No. 30] filed on April 2, 2024:

1. This is Plaintiff’s first request for extension of time to file an opposition to State Defendants’ Motion to Dismiss [ECF No. 24].
2. This is State Defendants first request for extension of time to file a reply to Plaintiff’s opposition to State Defendants’ Motion to Dismiss [ECF No. 24], once filed.
3. This is also Plaintiff’s first request for extension of time to file an opposition to State Defendants’ Motion to Stay Case or Discovery [ECF No. 30] on April 2, 2024.
4. State Defendants first request for extension of time to file a reply to Plaintiff’s opposition to State Defendants’ Motion to Stay Case or Discovery [ECF No. 30], once filed.
5. Plaintiff shall have an extension of 21-days to file and serve her Opposition to State Defendants’ Motion to Dismiss [ECF No. 24], making the new deadline **May 6, 2024**.
6. State Defendants shall have **21-days** to file and serve their reply to Plaintiff’s opposition to State Defendants’ Motion to Dismiss [ECF No. 24], once filed.
7. Plaintiff shall also have an extension of 21-days to file and serve her Opposition to State Defendants’ Motion to Stay Case or Discovery [ECF No. 30], making the new deadline **May 7, 2024**.
8. State Defendants shall have **21-days** to file and serve their reply to Plaintiff’s opposition to State Defendants’ Motion to Stay Case or Discovery [ECF No. 30], once filed.

1 9. These extensions are not sought for an improper purpose or to cause unnecessary delay.

2 Good cause for the extension exists and is pursuant to Local Rules, Plaintiff Jane Doe
3 has “14 days after service of the motion” to file and serve her reply. *See* LR 7-2(b).
4 Fourteen days after filing the Motion to Dismiss [ECF No. 24] is Monday, April 15,
5 2024, and Tuesday, April 16, 2024, for the Motion to Stay Case or Discovery [ECF
6 No. 30]. More specifically, Counsel for Plaintiff have three deadlines in the instant case
7 within two days: Opposition to State Defendants’ Motion to Dismiss on April 15, 2024;
8 Joint Case Management Report on April 15, 2024; and Opposition to State Defendants’
9 Motion to Stay Case or Discovery on April 16, 2024. In addition, Counsel is filing a
10 petition for writ of certiorari in the case *Williams v. Sisolak*, 2:21-CV-01676 that is due
11 on April 17, 2024. Finally, counsel for Plaintiff, Mr. Guinasso, has also switched law
12 firms since the Motion to Dismiss [ECF No. 24] and Motion to Stay Case or Discovery
13 [ECF No. 30] were filed, and is currently undergoing orientation at his new firm. To
14 provide the parties sufficient time to prepare responsive pleadings, , the parties
15 amicably agreed upon the above extension.

16 10. It is within the discretion of the Court to grant an extension of time. *See, e.g.,*
17 *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1258 (9th Cir. 2010). The instant
18 Stipulation is not filed for the purpose of delay. Due to the converging reply deadlines
19 in the instant case, deadline for petition for writ of certiorari in *Williams v. Sisolak*, and
20 Plaintiff’s counsel changing law firms, the parties will have insufficient time to prepare
21 adequately well-briefed responsive pleadings to these motions.

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1 **IT IS SO STIPULATED.**

2 DATED this 12th day of April, 2024.

 DATED this 12th day of April, 2024.

3 **AARON FORD**
4 **Attorney General**

GUINASSO LAW, LTD.

5 /s/ Iva K. Todorova

/s/ Jason D. Guinasso

6 _____
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14 *Attorneys for Governor Joseph Lombardo*
15 *and Attorney General Aaron Ford*

ORDER

11. IT IS HEREBY ORDERED that Plaintiff shall have an extension of 21-days to file and serve her Opposition to State Defendants' Motion to Dismiss [ECF No. 24], making the new deadline **May 6, 2024**.

12. State Defendants shall have **21-days** to file and serve their reply to Plaintiff's opposition to State Defendants' Motion to Dismiss [ECF No. 24], once filed.

13. Plaintiff shall also have an extension of 21-days to file and serve her Opposition to State Defendants' Motion to Stay Case or Discovery [ECF No. 30], making the new deadline **May 7, 2024**.

14. State Defendants shall have **21-days** to file and serve their reply to Plaintiff's opposition to State Defendants' Motion to Stay Case or Discovery [ECF No. 30], once filed.

IT IS SO ORDERED THIS 12th Day of April 2024.


DISTRICT COURT JUDGE

Respectfully Submitted by:
GUINASSO LAW, LTD.

By: /s/ Jason D. Guinasso
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